EXHIBIT F

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May 7, 2012

VIA ELECTRONIC MAIL

Frank M. Hinman, Esq.
Bingham McCutchen LLP
1117 S. California Avenue
Palo Alto, CA 94304-1106

> Re: *In re: High-Tech Employee Antitrust Litigation*,
>   **Master Dkt. No. 11-cv-2509 (N.D. Cal.)**

Dear Mr. Hinman:

I write on behalf of Plaintiffs in the above-captioned matter in response to Intel Corporation's ("Intel") production of data with the following file names:

> 2001 YE USA, 2002 YE USA, 2003 YE USA;
> 12-2004, 12-2005, 12-2006, 12-2007, 12-2008, 12-2009, 12-2010, 12-2011;
> Emp Data as of 12 31 01, Emp Data as of 12 31 02, Emp Data as of 12 31 03; and
> CandidatesForFilledReqs_Report2.

First, please let us know by tomorrow, May 8, 2012, whether Intel has finished producing data responsive to Plaintiffs' requests, and if not, by what date Intel's data production will be complete. Please note that Exhibit 1 to this letter lists categories of data that have not been produced, that were included in Plaintiffs' requests for production, and that Plaintiffs need for purposes of class certification analysis. In addition to the information listed in Exhibit 1 that Intel has not yet produced, please produce the individual encrypted IDs that Defendants agreed to provide. Given the fast-approaching class certification deadlines, it is imperative that Intel produce all relevant data immediately.

Second, Exhibit 1 also contains a list of questions concerning Intel's data. Given the nature and scope of Plaintiffs' questions, Plaintiffs believe that the most productive way to address these questions would be through a teleconference involving Plaintiffs' counsel, a staff

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member of Plaintiffs' consulting expert, and a representative of Intel who is knowledgeable about the data produced by Intel. Please propose a time this week when Intel will make available a person knowledgeable about the data produced in this litigation for such a teleconference.

Thank you, and please feel free to contact me with any questions.

Sincerely,

Daniel J. Walker

cc: Dean Harvey

Enclosure

Exhibit 1 to May 7, 2012 Walker Letter

I.   **Employee Data Questions & Issues Relating to:**

2001 YE USA, 2002 YE USA, 2003 YE USA;
12-2004, 12-2005, 12-2006, 12-2007, 12-2008, 12-2009, 12-2010, 12-2011; and
Emp Data as of 12 31 01, Emp Data as of 12 31 02, Emp Data as of 12 31 03.

A.   Please provide a data dictionary explaining what each field represents in the produced files. To the extent such data dictionary does not exist, please explain what the following fields represent:

    a. Employee Information (unless noted, all variables are found in the 2009 to 2011 files but with negligibly different names)

        1. TIG

        2. TIJ

        3. TIO

        4. IN_COMPANY

        5. IN_MA_DT

        6. DIRLABOR

        7. HRDID

        8. EBTGT

        9. STOCKLVL1 to STOCKLVL3

        10. CODE

        11. LEV1NUM to LEV11NUM

        12. LEVEL1 to LEVEL11

        13. DESIRED

        14. ORG1 to ORG3 (2004-2007)

        15. STOCKLVL (2004-2007)

        16. SERVICE (2004-2007)

        17. MERGER (2001-2003)

        18. HDCNTCO (2001-2003)

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19. GRADE DATE (2001-2003)

20. LOS (2001-2003)

21. REDEPLYD (2001-2003)

22. TREND1 to TREND3 (2001-2003)

b. Employee Salary Information

1. TGT

2. COMP_RATECD

B.   Please provide an explanation for all of the values found in the following fields (unless noted, all variables are found in the 2009 to 2011 files but with negligibly different names):

1. REGION

2. SUBREGN

3. GRADE

4. IN_COMPANY

5. MERGER (2001-2007)

6. EMPCLASS

7. RATING1 to RATING3

8. STOCKLVL (2001-2003)

9. STOCKLVL1 to STOCKLVL3

10. ORGUNIT

11. DESIRED

12. LOS (2001-2003)

13. TREND1 to TREND3 (2001-2003)

C.   Some fields are absent or not populated in some files. Please provide the following missing information:

1. Manager ID in 2001 (variable missing) and 2008 (MGRWWID is blank)

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    2.   Salary for inactive employees in 2001-2003

D.   Please provide the following additional fields:

    1.   Previous Employer

    2.   Compensation at Previous Employer

    3.   Birth Date

    4.   Education Institution

    5.   Channel of Hiring

    6.   Bonus

    7.   Field identifying whether an employee is salaried or not

    8.   Benefits

    9.   Stock Option Grants

    10. All variables regarding new employer upon exit

    11. All variables regarding outside offer

E.   The employee data for 2008 (file name '12-2008') contains what appear to be corrupt records in Rows 2130, 4142, 11833, 15168, 16676, and 48751 to 48753. Please provide these records in a format consistent with other data in the file.

F.   The WWID field appears to represent a unique employee identifier. Please explain whether the ID is an internal ID unique to Intel or it represents a uniform and constant ID across Defendants, such as an encrypted Social Security Number.

II.   **Hiring and Recruiting Data Questions & Issues Relating to:**

CandidatesForFilledReqs_Report2.

A.   Please provide a data dictionary explaining what each field represents in the produced files. To the extent such a data dictionary does not exist, please explain what the following fields represent:

    1.   GRADE_FROM

    2.   IN_FORMER_TYPE

B.   Please provide an explanation for all of the values found in the following:

    1.   GRADE_FROM

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    2. IN-FORMER_TYPE

C.   The following fields are populated exclusively with a NULL value in 2001 through most of 2006. Please provide the missing information to the extent it is available from other data sources.

    1. FirstPostingDt

    2. RecruitmentSourceType

    3. RecruitmentSourceName

    4. BaseSalary

    5. IncentiveAmt

    6. TotalSalaryAmt

D.   In addition, some fields are often populated with a NULL value throughout the Relevant Period. Please explain whether a NULL value indicates that the field is not applicable for the observation or it indicates a missing value. Please provide any missing information to the extent it is available from other data sources.

    1. FirstPostingDt

    2. RecruitmentSourceType

    3. RecruitmentSourceName

    4. EMPLID

    5. APPLID

    6. FormerWWID

    7. MostRecentEmployer

    8. EmployerName1

    9. EmployerName2

    10. EmployerName3

    11. EmployerName4

    12. MaxStudyLevelDescr

    13. StatusReasonDescr

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    14. StatusCdDescr

    15. RejectOrWithdrewMotive

    16. HireDate

    17. GRADE

    18. CurrentEmplStatus

E.   The EMPLID and APPLID fields appear to represent a unique employee and applicant identifier, respectively. To the extent the IDs represent internal IDs, please provide a uniform and constant ID across Defendants, such as an encrypted Social Security Number, corresponding to each unique EMPLID and APPLID.

F.   Please indicate whether or not any data regarding cold-calling recruiting data were included in the applicant data provided. If any cold-calling recruiting data were included, please explain how such data can be identified. If not, please provide cold-calling recruiting data as previously requested, including the following fields:

    1. Position at Time of Contact

    2. Year of Experience

    3. Salary History

    4. Resume

G.   The data file contains a worksheet for each year in the Relevant Period. Please explain which date (*e.g.*, posting date, application date) the year corresponds to or what the year presents.

H.   The CandidateNo field often contains negative values in earlier periods. For example, all values in the field are negative in 2005. Are these values valid?

I.   Please explain how the CandidateType field is different than the ExtOrIntCandidate field. These fields both contain either 'Internal' or 'External.' In some observations, the values are not equal.